

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:19-MC-00028**

FORTITUDE FINANCIAL  
INVESTMENTS, INC.,

Plaintiff,

v.

LSTAR MANAGEMENT, LLC,

Defendant.

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**RECEIVER'S MOTION TO  
APPROVE SETTLEMENT AND  
RELEASE AGREEMENT**

Margaret R. Westbrook, Esq. ("Receiver"), as Receiver for LStar Management, LLC ("Management"), by and through undersigned counsel, hereby moves the Court for an Order approving the proposed Settlement and Release Agreement between Kyle Corkum ("Corkum") and Receiver.

The proposed Settlement and Release Agreement is entered into pursuant to the authority vested in Receiver via the Court's prior Order appointing Receiver on March 11, 2020 (ECF No. 9). For the reasons set forth in the accompanying brief in support, Receiver requests that the Court enter an Order approving the proposed Settlement and Release Agreement between Receiver and Corkum.

**WHEREFORE**, Receiver respectfully prays that the Court enter an Order approving the proposed Settlement Agreement between Corkum and Receiver.

Respectfully submitted, this the 12th day of November, 2021.

**K&L GATES LLP**

/s/ Margaret R. Westbrook

Margaret R. Westbrook

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a copy of this document to be filed electronically through CM/ECF and, thus, to be served by electronic notification on those parties properly registered for electronic service through this Court's CM/ECF system, including the following:

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Respectfully submitted this 12th day of November, 2021.

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